

### REMARKS

In response to the Office Action dated March 3, 2010, Applicant submits the following remarks. Claims 14, 17-21, 46, 49-54, and 57-61 have been amended. New claim 62 has been added.

#### **Section 102 Rejections**

Claims 14-21 and 46-61 were rejected under 35 U.S.C. § 102(b), for allegedly being anticipated by Hargrave III et al. (U.S. Patent No. 5,724,593, hereinafter "Hargrave").

Hargrave discloses a translation memory for computer assisted translation based upon an aligned file having a number of source language text strings paired with target language text strings. (See Abstract.) A posting vector file includes a posting vector associated with each source language text string in the aligned file. (See id.) Each posting vector includes a document identification number corresponding to a selected one of the source language text strings in the aligned file and a number of entropy weight values, each of the number of weight values corresponding to a unique letter n-gram that appears in the selected source language text string. (See id.) The translation memory also includes an inverted index comprising a listing of source language letter n-grams and a pointer to each of the posting vectors including an entry for the listed letter n-gram. (See id.)

Hargrave does not describe, "using a search engine to identify a plurality of documents responsive to the group of translated search queries," as recited by amended claim 14.

According to Hargrave, a translation memory is a database that collects translations as they are performed along with the source language equivalents. (See 2:38-45.) Hargrave explains that the translation memory is used to find all text segments in the aligned pair file 401 similar to the text of a query segment. (See 13:8-67 and FIG. 9.) But the translation memory is not a search engine. Moreover, the text segments that are found in the aligned pair file are not documents that have been identified by a search engine in responsive to a group of translated queries – they are predefined translations. (See 5:9-15.)

Accordingly, claim 14 is not anticipated by Hargrave. Independent claims 46 and 56 are not anticipated by Hargrave for at least the same reasons.

### Conclusion

All of the dependent claims are patentable for at least similar reasons as those for the claims on which they depend are patentable.

By responding in the foregoing remarks only to particular positions taken by the Examiner, Applicant does not acquiesce with other positions that have not been explicitly addressed. In addition, Applicant's arguments for the patentability of a claim should not be understood as implying that no other reasons for the patentability of that claim exist. Finally, Applicant's decision to amend or cancel any claim should not be understood as implying that Applicant agrees with any positions taken by the Examiner with respect to that claim or other claims.

The required RCE fee and the petition for a one-month extension of time are being paid concurrently herewith on the Electronic Filing System (EFS) by way of Deposit Account authorization. Please apply any other charges or credits to deposit account 06-1050.

Respectfully submitted,

Date: June 15, 2010 \_\_\_\_\_

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